

EXHIBIT B

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CACE-22-014017

	IN THE CIRCUIT COURT OF THE 17 TH JUDICIAL CIRCUIT, IN AND FOR BROWARD COUNTY, FLORIDA GENERAL JURISDICTION CASE NO. CACE 22-014017
ANTWON BLACK, Plaintiff, Vs. SCI FUNERAL SERVICES OF FLORIDA, LLC, a Florida limited liability d/b/a GOLD COAST CREMATORY Defendant.	

SUMMONS

THE STATE OF FLORIDA:

To all and singular the Sheriffs of the State:

YOU ARE HEREBY COMMANDED to serve this summons and a copy of the Complaint, in this action on Defendant:

SCI FUNERAL SERVICES OF FLORIDA, LLC, a Florida limited liability company
d/b/a GOLD COAST CREMATORY
By Serving its Registered Agent: CORPORATION SERVICE COMPANY,
1201 Hays Street
Tallahassee, FL 32301-2525

Each defendant is required to serve written defenses to the Complaint or Petition on Plaintiff's attorney, Law Offices of Steven M. Singer, P.A., 600 Corporate Drive, Suite 320, Fort Lauderdale, Florida 33334, within twenty (20) days after serve of this summons on that defendant, exclusive of the day of service, and to file the original of the defenses with the Clerk of this Court either before service on Plaintiff's attorney or immediately thereafter. If a defendant fails to do so, a default will be entered against the defendant for the relief demanded in the Complaint or Petition.

WITNESS my hand and the seal of said Court on SEP 21 2022

BRENDA D. FORMAN
as Clerk of Circuit Court

By: _____



BRENDA D. FORMAN

	IN THE CIRCUIT COURT OF THE 17 TH JUDICIAL CIRCUIT, IN AND FOR BROWARD COUNTY, FLORIDA GENERAL JURISDICTION CASE NO.
ANTWON BLACK, Plaintiff, Vs. SCI FUNERAL SERVICES OF FLORIDA, LLC, a Florida limited liability d/b/a GOLD COAST CREMATORY Defendant.	

COMPLAINT FOR DAMAGES

COMES NOW Plaintiff, ANTWON BLACK, by and through his undersigned counsel, sues the Defendant, SCI FUNERAL SERVICES OF FLORIDA, LLC, a Florida limited liability company d/b/a GOLD COAST CREMATORY, and alleges as follows:

JURISDICTION, VENUE AND PARTIES

1. This is an action to recover damages in excess of the jurisdictional limits of this Court, to wit: damages in excess of \$30,000.00, exclusive of attorneys' fees, costs and interest, and pursuant to Chapter 448, Florida Statutes, and Plaintiff hereby demands a trial by jury, accordingly, although, to file this complaint, undersigned counsel is being required by order of the Supreme Court of Florida to contemporaneously complete a civil cover sheet with a dollar figure as an

estimated amount of claim for data collection and clerical processing purposes only, the full monetary value of the damages suffered by Plaintiff is yet to be determined and will be decided by a verdict by the jury that judges the facts of this action, in compliance with Article I, Section 22, Florida Constitution.

2. All conditions precedent to the bringing of this lawsuit have occurred or have been performed.

3. At all times relevant hereto, Plaintiff, ANTWON BLACK, was and is a resident of Broward County, Florida, and is sui juris (hereinafter BLACK or Plaintiff).

4. Defendant, SCI FUNERAL SERVICES OF FLORIDA, LLC, is a Florida limited liability company, in the funeral and cemetery business, and doing business as GOLD COAST CREMATORY (hereinafter GOLD COAST or Defendant), in Broward County, Florida.

**WRONGFUL TERMINATION OF EMPLOYMENT PURSUANT TO CHAPTER
FLA. STAT. 448**

5. BLACK was an employee of GOLD COAST at its Broward County, City of Fort Lauderdale, location from December 2021, until he was terminated on or about June 15, 2022.

6. While employed, BLACK's duties included supervising the intake, identification, and cremation of the deceased.

7. Also, while employed by GOLD COAST, BLACK discovered that other employees of GOLD COAST failed and refused to collect cremains and

completely clean the crematorium after each cremation, such that because of said failure, it allowed the cremains of multiple deceased to be co-mingled.

8. BLACK notified his superiors and supervisors of the failure of GOLD COAST's employees to completely collect the cremains of each deceased and clean the crematorium following each cremation which led to co-mingling of cremains of multiple deceased.

9. BLACK also notified his superiors and supervisors that incoming deceased persons were not being properly documented and identified which allowed cremains to be delivered to the wrong families

10. In addition to notifying his superiors and supervisors that GOLD COAST employees were failing to complete collect the cremains of each deceased and clean the crematorium following each cremation leading to co-mingling of cremains of multiple deceased, and that incoming deceased persons were not being properly documented and identified, BLACK objected to and refused to participate in these improper, wrongful, and illegal activities and practices of his employer.

11. GOLD COAST retaliated against BLACK by terminating his employment on or about June 15, 2022, in violation of Fla. Stat 448.102(3), because BLACK objected to and refused to participate in the aforesaid improper, wrongful and illegal activities.

12. BLACK has suffered economic damages, both past and in the future, and mental anguish and is entitled to an award of those compensatory damages pursuant to Fla. Stat 448.103(2).

13. BLACK has agreed to pay the undersigned a reasonable fee for his services, and BLACK should be awarded to his court costs and reasonable attorneys' fees pursuant to Fla. Stat. 448.104.

WHEREFORE, BLACK demands judgment for all damages pursuant to Fla. Stat. 448, and for costs and reasonable attorney's fees pursuant to Fla. Stat. 448.104.

DEMAND FOR TRIAL BY JURY

Plaintiff hereby demands a trial by jury of all issues so triable as a matter of right

DATED, this 19 day of September 2022.

Law Offices of
STEVEN M. SINGER, P.A.
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By: 

Steven M. Singer, Esq.
Florida Bar No. 352381